

Tang et al. v. United States of America
1:23-cv-09885-LTS-RFT (S.D.N.Y.)

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April 18, 2025

Hon. Robyn F. Tarnofsky
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

At Plaintiffs' request, the letter motion at ECF 94 is deemed withdrawn. The conference scheduled for April 24, 2025 at 10 AM is adjourned sine die. The Clerk of Court is respectfully requested to terminate ECF 94.

Date: April 21, 2025
New York, NY

SO ORDERED


ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

Re: *Tang, et al. v. United States of America*, 1:23-cv-09885-LTS-RFT (S.D.N.Y.)

Dear Judge Tarnofsky,

Plaintiffs submit this letter to respectfully withdraw their April 15, 2025, request for a pre-motion conference, ECF 94.

After the filing of the request, USCIS offered a compromise, and the parties ultimately agreed on the following:

1. By April 24, USCIS will produce Chapters VI and VII and Sections XII.B and XII.D from one latest / most updated version of the NaBISCOP per year from 2017 to March 31, 2024;
2. If for a specific version of the NaBISCOP, the produced portions do not contain the reuse policies, USCIS will promptly produce the rest of that version of the NaBISCOP upon Plaintiffs' request;
3. If USCIS locates the NaBISCOP from the 2014, 2015, or 2016 years, it will produce at least one version per year promptly; and
4. If the produced yearly versions show variations in reuse policies, upon Plaintiffs' request, USCIS will promptly produce all additional versions of those portions that it can locate upon conducting a reasonable search. For example, if the 2017 version

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contains a policy different from the 2018 version, USCIS will produce additional versions between the 2017 version and the 2018 version.

Thus, Plaintiffs respectfully withdraw their request for a pre-motion conference. Plaintiffs thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Geng Chen

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CERTIFICATE OF SERVICE

On April 18, 2025, I hereby certify that I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification to the attorneys of record.

/s/ Geng Chen
Geng Chen